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Rcvd By HP

Date 10-5-05

October 4, 2005

Chairman Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: Sprint's Petition to Intervene
Docket No. 05-00251

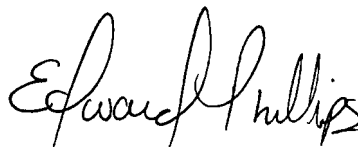
Dear Chairman Jones:

Please find enclosed an original and thirteen (13) copies of United Telephone-Southeast, Inc.'s Petition to Intervene in the above-referenced Docket. Also enclosed is a check in the amount of \$25.00 to cover the filing fee.

An extra copy of this letter is enclosed. Please date stamp it and return to me in the enclosed self-addressed stamped envelope.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely yours,


Edward Phillips

HEP:sm

Enclosures

cc: Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In Re:

Application of Bristol Tennessee Essential Services
for a Certificate of Convenience and Necessity to
Provide Competing Telecommunications Services

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) Docket No. 05-00251
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)
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PETITION TO INTERVENE

United Telephone-Southeast, Inc. ('UTSE') petitions the Tennessee Regulatory Authority ('Authority') for leave to intervene under Tenn. Code Ann. §§ 4-5-310 and 65-2-107 and Rule 1220-1-2-.08 of the Authority's Rules and Regulations. In support of this request, UTSE states the following:

1. UTSE is an incumbent local exchange carrier in the State of Tennessee and provides comprehensive telecommunications services to customers located in Northeast Tennessee, including services provided to customers in the City of Bristol.

2. Bristol Tennessee Essential Services ('BTES') seeks approval to provide competitive local telecommunications services "throughout the State of Tennessee."¹

3. BTES is seeking to provide services in Bristol, Tennessee and a portion of Sullivan County, and by doing so BTES will be in competition with UTSE.² Also, BTES seeks a grant of statewide authority so that it may provide services outside of its current electric utility footprint. As a result, UTSE has a direct interest in how municipal applicants such as BTES will comply with the competitive safeguards set forth under Tenn. Code Ann. § 7-52-401, et seq. The

¹ See the Application of Bristol Tennessee Essential Services for a Certificate of Convenience and Necessity to Provide Competing Telecommunications Services at p.16.

² *Id.* At p.9

safeguards under Title 7, Chapter 52, Part 4 of the Code contemplate, among other things that no subsidies exist as a result of BTES's other utility operations. In addition, if BTES is to operate outside of its municipal limits, BTES must receive the consent of the municipalities outside of its corporate and/or county limits. BTES has not demonstrated in its Application that such consent has been obtained.


4. As demonstrated above, UTSE has set forth specific facts demonstrating that its legal rights, duties, privileges, immunities or other legal interests may be determined in this proceeding.

5. Because of its direct interest in this proceeding, UTSE believes its intervention in this matter is warranted.

6. Finally, the interests of justice and the orderly and prompt conduct of the proceedings will not be impaired by allowing the requested intervention.

WHEREFORE, based on the foregoing, UTSE respectfully requests that the Authority grant this Petition and permit UTSE to become a full party of record in this docket.

Respectfully submitted this 4th day of October, 2005.


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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Petition to Intervene of United Telephone-Southeast, Inc. upon all parties of record to this Docket by depositing a copy addressed to each in the United States Mail, first-class postage prepaid.

This 4th day of October, 2005.

Guy Hicks
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

Henry Walker
Boult, Cummings, et al.
1600 Division Street, #700
P. O. Box 340025
Nashville, TN 37203



Edward Phillips
United Telephone-Southeast, Inc.